

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

**CHARLENE CARTER,**

**Plaintiff,**

**V.**

**SOUTHWEST AIRLINES CO., AND  
TRANSPORT WORKERS UNION OF  
AMERICA,  
LOCAL 556,**

**Defendants.**

**Civil Case No. 3:17-cv-02278-X**

## DECLARATION OF MEGGAN JONES

I, Meggan Jones, declare as follows:

1. I am at least 18 years old. I have personal knowledge of the facts stated herein, and if called as a witness, could competently testify thereto.
2. I am Senior Manager of Inflight Labor Relations at Southwest Airlines Co. in Dallas, Texas. I have held that position since approximately August of 2020.
3. My job duties as Senior Manager of Inflight Labor Relations include, among other things, overseeing complaints relating to alleged violations of Southwest's social media policies. In connection therewith, I have access to records regarding previous complaints made regarding Southwest's social media policies.

4. In connection with this declaration, I was asked to review Southwest's records regarding the social media complaints relating to the following employees: Casey Rittner, Josh Rosenberg, Brian Talburt, Bill Holcomb Sam Wilkins and Rickie Spand.

5. I reviewed Southwest's records regarding the above identified employees, and the chart below reflects the information from those records regarding the social media related complaints:

<b>Employee Name (and Location)</b>	<b>Nature of Social Media Violation</b>	<b>Date of Violation / File Opened</b>	<b>Supervisor Who Investigated &amp; Issued Discipline</b>	<b>Ultimate Discipline Decision</b>
Casey Rittner (Atlanta)	Social Media Threat to Gary Kelly in connection with collective bargaining negotiations.	3/7/2016	Graham Vandergrift, Base Manager – Atlanta	Termination converted to 30-day suspension
Josh Rosenberg (Oakland)	Social Media Threat to Gary Kelly in connection with collective bargaining negotiations.	3/14/2017	Carolene Goulbourne Base Manager – Oakland	No violation found; Coach and Counsel
Sam Wilkins (Oakland)	Comments of a sexual nature regarding co-employee posted on Social Media.	3/26/2013	Brett Salyer Assistant Base Manager – Oakland	Coach and Counsel
	Threatening Social Media post regarding firearms and a political candidate	2012 post reported on 3/16/2017	Carolene Goulbourne Base Manager – Oakland	Coach and counsel
Brian Talburt (Phoenix)	Threatening Social Media in which employee used the term “execution”	9/30/2014	Deborah Edwards Base Manager – Phoenix	Termination converted to 30-day suspension
	Derogatory and profane language in a social media post regarding a coworker.	3/17/2015	Ted Thornton Asst. Base Manager – Phoenix	Termination converted to Written Warning
	Social media post related to co-worker allegedly dating other co-workers	8/19/2016	Jeff Simpson Inflight Supervisor – Dallas  Deborah Edwards Base Manager – Phoenix	Coach and Counsel

Bill Holcomb (Oakland)	Derogatory comments of a sexual nature regarding Southwest passenger.	4/10/2014	Brett Salyer Base Manager – Oakland	30-day suspension issued for two Social Media events - 7/30/14 and 3/10/15
	Comments on Social Media related to co-worker sexual orientation and alleged stalking of a co-worker.	3/10/2015		
Rickie Spand (Las Vegas)	Social media post related to co-worker allegedly dating other co-workers	8/19/2016	Jeff Simpson Inflight Supervisor – Dallas (Jackson)  Brandon Durbin Asst. Base Manger – Las Vegas (Spand)	Coach and Counsel
	Threatening Social media post related to union affiliation issues.	11/9/2016	Brandon Durbin Asst. Base Manger – Las Vegas (Spand)	Coach and Counsel

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Golden, Colorado on June 9<sup>th</sup>, 2022.




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Meggan Jones